

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STATE OF NEW YORK, et al.,)	
)	
Plaintiffs,)	
v.)	CIVIL ACTION NO. 25-11221-WGY
DONALD J. TRUMP, in his official capacity)		
as President of the United States, et al.,)	
)	
Defendants.)	

DECLARATION OF ESTHER ROSARIO FIEBIG
EXECUTIVE DIRECTOR OF CLIMATE JOBS NEW YORK EDUCATION FUND

I, Esther Rosario Fiebig pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury as follows:

RELEVANT BACKGROUND AND EXPERIENCE

1. I am over the age of 18 and competent to testify to the facts contained in this Declaration.
2. I am Executive Director of the Climate Jobs New York Education Fund (“CJNYEF”), a growing coalition of labor unions representing 2.6 million working men and

women at the center of New York's economy. We are committed to building a clean energy economy at the scale climate science demands, creating good jobs, and supporting equitable communities and a more resilient New York.

3. We empower New Yorkers, especially workers, in the civic engagement process to advance a low-carbon, equitable economy through trainings, workshops and educational exchanges. We engage all sectors—elected officials, policymakers, businesses and community—around pro-climate, pro-worker policies.

4. Members of our coalition directly represent thousands of workers building turbines in the water off the coast of New York for offshore wind farms to generate electricity for our energy system, as well as in thousands of additional jobs that are integrally related to this industry – including manufacturing component parts and the construction of needed infrastructure.

5. As New York State moves toward its renewable energy goals, there is a once-in-a-generation opportunity to ensure that the path to a low-carbon future results in good jobs that provide family-sustaining wages and benefits for communities across the state.

6. In New York, we have met with offshore wind developers to discuss the opportunities to create middle class jobs with good wages and family sustaining wages and benefits. We also promoted the value of project labor agreements for construction work and labor peace agreements, supporting workers' right to select a bargaining representative of their choosing, as means to ensure that the jobs created in the offshore wind industry promote and support a middle class lifestyle.

7. New York currently has two offshore wind projects moving forward – one in Suffolk County and one in Kings County (Brooklyn). Each project has already begun creating jobs in this industry. Workers in various trades have relied on the promise of growth in this industry to

seek training in particular areas that are unique to the offshore wind industry such as Helicopter Underwater Escape Training (HUET) and Global Wind Organization (GWO) certification training. In many instances, these workers traveled out of State to attain such training. In Brooklyn, workers have begun the heavy lift of retooling the South Brooklyn Marine Terminal to serve as a hub for assembling and barging out offshore wind turbines.

8. Over the course of the last several years, workers who are represented by our coalition's members have been gainfully employed working on wind industry projects off the coast of New York. They have worked tens of thousands of hours on such projects. Our members and the workers that they represent in this developing industry would continue to be the source of huge numbers of job opportunities well into the future, as developers had to build suitable port facilities, had to manufacture components never before manufactured in the U.S., and had to build the wind energy facilities that are the core of the industry's output.

9. New York State has passed legislation setting forth substantial goals to reduce carbon emissions and shift our energy sector towards clean and renewable energy. At the Climate Jobs New York Education Fund, we have advocated for an "all of the above" approach towards meeting these goals, which includes the use of offshore wind. In July 2025, we launched our "Energy Independence Month" campaign, educating the public that clean energy is American energy and that promoting offshore wind and similar green energy technologies will help establish America's energy independence. Additionally, we have highlighted the stories of union men and women throughout the state who are relying on investment in these opportunities to develop their crafts, grow their skills, and provide a future for themselves and their families while building and operating this new energy sector.

10. Workers represented by our members changed the very course of their lives in

order to participate in this work. I will share just a few examples:

11. Omar E. is a member of the Structural Steel & Bridge Painters, Local 806, District Council 9. As a Bridge Painter, he works on large structural projects applying specialized paints and applicants that fight corrosion. His fellow Local 806 members have worked on offshore wind projects both in construction and maintenance, which provide a new field of work to members of the Local and tremendous opportunity for them to be gainfully employed. He is very excited about these opportunities and hopes that he will be able to work on an offshore wind project in the near future.

12. Alex A. is a member of Structural Steel & Bridge Painters, Local 806, District Council 9. He is an apprentice with Local 806, learning through his training program about the different surfaces he would encounter working on offshore wind projects and developing his trade skills for this application of his craft. Given his investment in undergoing necessary apprenticeship training for this work, he is hopeful that these projects will continue to be available in the future so he can recoup his and his local's investments into this training.

13. Leidy J. is a member of the International Brotherhood of Electrical Workers ("IBEW"), Local 3 in New York. She is an apprentice with the union, having started training towards a career that can offer her the stability, safety and health benefits that she and her family need. She hopes to advance to working as a journeyperson with opportunities from offshore wind and clean energy projects. Given her investment in undergoing training for the stable career these jobs represent, she is hopeful that these projects will continue to be available for her in the future.

14. Kevyn G. is a member of the International Brotherhood of Electrical Workers ("IBEW"), Local 3 in New York. He is an apprentice with the union, having started training towards a career that can create a good livelihood. The training required to work on offshore wind

projects is important to him not only because it represents a good career, but also because he has seen extreme weather from climate change affect his community. He understands that the apprenticeship training will allow for these projects to be built correctly and safely. Given his and his local's investment in undergoing training for such work, he is hopeful that these opportunities for work will continue to be available.

15. Lisa H. is a member of the International Brotherhood of Electrical Workers (“IBEW”), Local 25 in New York. She is proud to have had the opportunity to work on performing electrical work on a converter station for an offshore wind farm in her community, because she wants her grandchildren to have the opportunity to live in an environment with clean air and clean water. This work, along with other work that she has gotten through her Local, allowed her to get a job with pay sufficient that she was able to put her two children through college. She has met fellow IBEW Local 25 members who are apprentices getting trained with the specialized skills necessary to work on offshore wind projects, and she hopes that these opportunities will continue to be available for them in the future.

16. Devin O. is a member of International Brotherhood of Electrical Workers (“IBEW”), Local 25. He worked on one of the first offshore wind turbines that went up off the coast of New York after getting trained to do so. His local, IBEW Local 25, put up a training facility to train apprentices and other members on the specialized skills necessary to work on offshore wind farms. Given their investment in training and learning these specialized skills, he hopes the jobs that the offshore wind industry represents will continue to be available for him and his fellow IBEW members. For Devin, his job meant that he was covered with health care benefits for himself and his family – including his two children. He is very glad that the offshore wind industry is being built – not only because of his own pay and benefits – but also because he is

worried about the effects of climate change on his community.

17. Many offshore wind projects are likely to be constructed pursuant to project labor agreements covering port buildouts and the offshore installation of the turbines in the Ocean. Project labor agreements establish uniform wages and benefits for workers on the project, ensure that the construction will provide jobs with family-sustaining wages under strong safety standards, and put millions of additional dollars forward to train New Yorkers for future jobs created within the offshore wind industry.

18. Despite this, the Wind Directive continues to threaten the future of the industry and workers who have trained to acquire skills for additional construction projects in the offshore wind industry. Without the prospect of future employment in the industry, workers are no longer incentivized to invest their time in developing the specialized skills that are required to assemble and install wind turbines offshore. The offshore wind halt creates uncertainty and fear over what opportunities will be available in this industry in the future.

19. The years of planning and the financial investment in offshore wind projects can be an example of how this industry can be utilized to generate good middle class employment opportunities for hard working New Yorkers. Instead of these employment opportunities being converted into long-term family sustaining careers, the offshore wind halt creates the danger that all of the time and training that workers invested into offshore wind will lead to nothing other than a short term job.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 11th day of August in 2025.

A handwritten signature in black ink, appearing to read 'Esther Rosario Fiebig', written over a horizontal line.

Esther Rosario Fiebig

Executive Director, Climate Jobs New York Education Fund